

SCHOEMAN, UPDIKE & KAUFMAN, LLP
60 East 42 Street
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David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

v.

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

**ALLIED BARTON SECURITY
SERVICES LLC,**

Defendant.

PLEASE TAKE NOTICE that upon the annexed Affidavit of David B. Gordon, sworn to January 3, 2008, with the exhibits annexed thereto and pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, the undersigned shall move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007 at a date and time to be determined by the Court for an Order admitting Marty N. Martenson and Donna L. Keeton, members of the Bar of the State of Georgia, to the Bar of this Court *pro hac vice*.

Dated: January 3, 2008
New York, New York

SCHOEMAN, UPDIKE & KAUFMAN, LLP
Attorneys for Defendant Allied Barton Security
Services LLC

By: 
David Gordon (DG 0010)
60 East 42nd Street
New York, NY 10165
(212) 661-5030

SCHOEMAN, UPDIKE & KAUFMAN, LLP
60 East 42 Street
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David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

v.

**ALLIED BARTON SECURITY
SERVICES LLC,**

**AFFIDAVIT OF DAVID B. GORDON
IN SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC VICE**

Defendant.

David B. Gordon, being duly sworn, hereby deposes and says as follow:

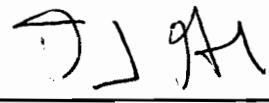
1. I am a Partner at Schoeman, Updike & Kaufman, LLP, counsel for Defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's Motion to admit Marty N. Martenson and Donna L. Keeton as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Marty N. Martenson is a Partner with the firm Martenson, Hasbrouck & Simon LLP, which has its principal office located at 3379 Peachtree Road, N.E., Suite 400,

Atlanta, Georgia 30326. Mr. Martenson has been a member in good standing of the bar of the State of Georgia since 1989. He was also admitted to the United States District Court for the Northern District of Georgia in 1991, and has also been admitted generally or *pro hac vice* in various other state and federal courts. He is a member in good standing in every jurisdiction in which he has been admitted. (See Certification of Marty N. Martenson and Letter from State Bar of Georgia, attached hereto as Exhibit A.)

4. Donna L. Keeton is an Associate with the firm Martenson, Hasbrouck & Simon LLP, which has its principal office located at 3379 Peachtree Road, N.E., Suite 400, Atlanta, Georgia 30326. Ms. Keeton has been a member in good standing of the bar of the State of Georgia since 1999. She was also admitted to the United States District Court for the Northern District of Georgia in 1999, and has also been admitted generally or *pro hac vice* in various other state and federal courts. She is a member in good standing in every jurisdiction in which she has been admitted. (See Certification of Donna L. Keeton and Letter from State Bar of Georgia, attached hereto as Exhibit B.)
5. I respectfully submit a proposed order granting the admissions of Mr. Martenson and Ms. Keeton, *pro hac vice*, which is attached as Exhibit C.

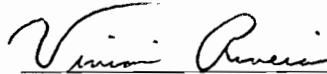
WHEREFORE, it is respectfully requested that the motion to admit Marty N. Martenson and Donna L. Keeton, *pro hac vice*, to represent Defendant in the above-captioned matter be granted.

Dated: January 3, 2008
New York, NY



David Gordon (DG 0010)

Sworn to before me this
3rd day of January, 2008.



Notary Public

VIVIAN RIVERA
Notary Public, State of New York
No. 31-4708970
Qualified in Orange County
Commission Expires 4/30/10

SCHOEMAN, UPDIKE & KAUFMAN, LLP
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David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

10

**CERTIFICATION OF
MARTY N. MARTESEN**

**ALLIED BARTON SECURITY
SERVICES LLC,**

Defendant.

STATE OF GEORGIA)
)
COUNTY OF FULTON) ss.:

Marty N. Martenson, Esq., being of full age, certifies as follows:

1. I am an attorney-at-law of the State of Georgia, and I am a Partner in the law firm of Martenson, Hasbrouck & Simon LLP, which has its principal office located at 3379 Peachtree Road, N.E., Suite 400, Atlanta, Georgia 30326. I am fully familiar with the facts set forth herein. I submit this Certification in support of the application of Schoeman, Updike & Kaufman, LLP to permit my appearance *pro hac vice* in the above-captioned action.

2. I practice law principally in the State of Georgia, and I have been a member in good standing of the bar of the State of Georgia since 1989. A letter of good standing from the State Bar of Georgia is attached hereto. In addition, I am admitted to practice before the U.S.

District Court for the Northern District of Georgia (admitted in 1991) and have been admitted generally or *pro hac vice* in various other state and federal courts. I am a member in good standing in every jurisdiction in which I have been admitted.

3. My firm is associated in this matter with New York counsel, David B. Gordon, a member of Shoeman, Updike & Kaufman, LLP, who is qualified to practice law in New York.

4. AlliedBarton Security Services LLC has requested that I represent them in this action.

5. No disciplinary proceedings are pending against me in any jurisdiction. I am aware of my continuing responsibility, if admitted in this matter *pro hac vice*, to advise this Court of any disciplinary proceedings that may be instituted against me in this or any other jurisdiction during the duration of this matter.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 12/21/07



Marty N. Martenson, Esq.
Georgia Bar No. 471100



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Mr. Marty Norenburg Martenson
Martenson Hasbrouck & Simon LLP
3379 Peachtree Road, N.E., Suite 400
Atlanta, GA 30326

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 06/12/1989

Attorney Bar Number: 471100

Today's Date: December 10, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

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FAX (229) 382-7435

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David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

v.

**CERTIFICATION OF
DONNA L. KEETON**

**ALLIED BARTON SECURITY
SERVICES LLC,**

Defendant.

STATE OF GEORGIA)
) ss.:
COUNTY OF FULTON)

Donna L. Keeton, Esq., being of full age, certifies as follows:

1. I am an attorney-at-law of the State of Georgia, and I am an associate in the law firm of Martenson, Hasbrouck & Simon LLP, which has its principal office located at 3379 Peachtree Road, N.E., Suite 400, Atlanta, Georgia 30326. I am fully familiar with the facts set forth herein. I submit this Certification in support of the application of Schoeman, Updike & Kaufman, LLP to permit my appearance *pro hac vice* in the above-captioned action.

2. I practice law principally in the State of Georgia, and I have been a member in good standing of the bar of the State of Georgia since 1999. A letter of good standing from the State Bar of Georgia is attached hereto. In addition, I am admitted to practice before the U.S.

District Court for the Northern District of Georgia (admitted in 1999) and have been admitted generally or *pro hac vice* in various other state and federal courts. I am a member in good standing in every jurisdiction in which I have been admitted.

3. My firm is associated in this matter with New York counsel, David B. Gordon, a member of Shoeman, Updike & Kaufman, LLP, who is qualified to practice law in New York.

4. AlliedBarton Security Services LLC has requested that I represent them in this action.

5. No disciplinary proceedings are pending against me in any jurisdiction. I am aware of my continuing responsibility, if admitted in this matter *pro hac vice*, to advise this Court of any disciplinary proceedings that may be instituted against me in this or any other jurisdiction during the duration of this matter.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 12/21/07


Donna L. Keeton
Donna L. Keeton, Esq.
Georgia Bar No. 006961



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Ms. Donna Lynn Keeton
Martenson Hasbrouck & Simon LLP
3379 Peachtree Road, NE, Suite 400
Atlanta, GA 30326

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 11/19/1999

Attorney Bar Number: 006961

Today's Date: December 10, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
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This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Judy Hill
Official Representative of the State Bar of Georgia

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David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

v.

**ORDER OF ADMISSION
*PRO HAC VICE***

**ALLIED BARTON SECURITY
SERVICES LLC,**

Defendant.

Pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York and upon affidavit of David B. Gordon, a member of the bar of this Court, sworn to on January 3, 2008, and the certifications of Marty N. Martenson and Donna L. Keeton, both sworn to on December 21, 2007, it is hereby

ORDERED that Marty N. Martenson and Donna L. Keeton, members of the Bar of the State of Georgia, are hereby admitted to the to this Court *pro hac vice* for the purpose of representing Defendant AlliedBarton Security Services LLC in this matter.

Dated: January ___, 2008
New York, New York

SO ORDERED:

Robert P. Patterson, United States District Judge

SCHOEMAN, UPDIKE & KAUFMAN, LLP
60 East 42 Street
New York, NY 10165
(212) 661-5030
David B. Gordon (DG 0010)

*Attorneys for Defendant
AlliedBarton Security Services LLC*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOLORES EMILIANO,

CASE NO.: 07 CV 8234 (RPP)

Plaintiff,

CERTIFICATE OF SERVICE

v.

**ALLIED BARTON SECURITY
SERVICES LLC,**

Defendant.

I, Gloria Carrion, hereby certify that I have served a true and correct copy of Defendant's Notice of Motion to Admit Counsel *Pro Hac Vice*, along with the supporting affidavits and exhibits, and a proposed Order of Admission Pro Hac Vice, via United States First Class Mail to Plaintiff's counsel of record:

Paul N. Cisternino, Esq.
Law Office of Paul N. Cisternino, P.C.
16 Briarbrook Road
Ossining, NY 10562

This 4 day of January, 2008.

